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**UNITED STATES DISTRICT COURT
IN AND FOR THE DISTRICT OF NEVADA**

GALLAGHER-KAISER CORPORATION, a
Michigan corporation,

Plaintiff,

vs.

LIBERTY DUCT, LLC, a Nevada limited
liability company; BIO SHIELD TECH, LLC,
a foreign limited liability company;
HARTFORD CASUALTY INSURANCE
COMPANY, an Indiana insurance
corporation; NGM INSURANCE
COMPANY, a Florida corporation; and DOES
1-10 Insurance Company(ies), inclusive,

Defendants.

CASE NO. : 2:14-cv-00869-GMN-DJA

**STIPULATION AND REQUEST FOR
ORDER EXTENDING PLAINTIFF
GALLAGHER-KAISER
CORPORATION'S TIME TO RESPOND
TO DEFENDANT NGM INSURANCE
COMPANY'S MOTION FOR
SUMMARY JUDGMENT**

(Second Request)

Plaintiff, GALLAGHER-KAISER CORPORATION ("GK"), by and through its attorneys
of record, the law firm of PEEL BRIMLEY LLP, and Defendant, NGM INSURANCE COMPANY
("NGM"), by and through its attorneys of record, the law firm of BARRETT & MATURA, P.C.,
hereby stipulate and agree as follows:

WHEREAS, NGM filed its Motion for Partial Summary Judgment on May 15, 2025
(the "Motion");

WHEREAS, the Parties previously stipulated to extend the deadline for GK to file its
Response (the "Response") to the Motion to July 14, 2025;

WHEREAS, due to scheduling conflicts, GK requested and received from NGM's counsel
an additional extension through Friday, July 18, 2025 to file its Response to the Motion;

1 **THEREFORE**, the parties agree and stipulate that GK shall have up to and including
2 Friday, July 18, 2025 to file its Response to the Motion.

3 **IT IS SO STIPULATED.**

4 Dated this 14th day of July, 2025.

5 **PEEL BRIMLEY LLP**

6 **BARRETT & MATURA, P.C.**

7 /s/ Cary Domina

8 /s/ Kevin C. Barrett

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26 *Attorney for NGM Insurance Company*

27 **IT IS SO ORDERED.**

28 July 14, 2025



US District Court Judge

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